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November 27, 2017

The United States Environmental Protection Agency
ATTN: Regional Freedom of Information Officer
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

RE: Freedom of Information Act Request

Dear Regional Freedom of Information Officer:

This is a request for records under the Freedom of Information Act. After you have a chance to review the enclosed request and to survey the documents potentially responsive, please call Ms. Vaughn or me so we can discuss logistics and possible refinement of this request.

We request that the records responsive to this request be made available to:

Paul D. Trimble
Carrie L. Vaughn
Spencer Fane, LLP
9400 N. Broadway Ext, Suite 600
Oklahoma City, Oklahoma 73114
Telephone: (405) 844-9900
Email: ptrimble@spencerfane.com
cvaugn@spencerfane.com

I appreciate your prompt attention to this matter, and if you have any questions, please contact me or Ms. Vaughn.

Sincerely,

Paul D. Trimble

OK 264537.1



FREEDOM OF INFORMATION ACT REQUEST

The following legal descriptions are collectively referred to herein as the “Area of Interest” or “AOI”:

I. Osage County, Oklahoma: The S/2 of Section 1, all of Section 2, SE/4 of Section 3, E/2 of Section 10, all of Section 11, all of Section 12, all of Section 13, all of Section 14, E/2 of Section 15, E/2 Section 22, all of Section 23, and all of Section 24, all in Township 27N, Range 5E, Osage County, Oklahoma.

**These requests seek documents and information regarding the specific legal descriptions in Osage County, Oklahoma, pertaining to the Underground Injection Control (UIC) Final Area Permit No. 06S1264P6273. It is our understanding this permit covers many other tracts in Osage County, but it is our intention to limit the requests to the lands described above.

-and-

II. Kay County, Oklahoma: Section 3, Section 4, Section 9, Section 10, Section 15 and Section 16 of Township 27N, Range 5E, Kay County, Oklahoma.

**The Kay County lands described above are not associated with the Underground Injection Control (UIC) Final Area Permit No. 06S1264P6273.

(Collectively the “Area of Interest” or “AOI”).

We request that you make available to us all records (including electronic files and reports) regarding the AOI, including but not limited to records concerning any environmental response activities including those undertaken pursuant to the Safe Drinking Water Act (“SDWA”), other laws, other authorities, publicly, privately, or voluntarily.

In particular (but not by way of limitation), this request seeks the following regarding the AOI:

1. Underground Injection Control (UIC) Final Area Permit No. 06S1264P6273 – Osage County, Oklahoma;
2. Any authorizations, amendments or terminations to UIC Final Area Permit No. 06S1264P6273;
3. Records regarding any violations or complaints regarding UIC Final Area Permit No. 06S1264P6273;
4. Permit Reviews of UIC Final Area Permit No. 06S1264P6273;



5. An inventory of all wells permitted within the AOI;
6. The following records are requested applicable to any wells or wellbores in the AOI;
 - (1) Part I: Permit Review and Issuance/Wells in Area of Review (EPA Form 7520-1);
 - (2) Part II: Compliance Evaluation (EPA Form 7520-2A);
 - (3) Part II: Compliance Evaluation Significant Noncompliance (EPA Form 7520-2B);
 - (4) Part III: Inspections Mechanical Integrity Testing (EPA Form 7520-3);
 - (5) Part IV: Quarterly Exceptions List (EPA Form 7520-4);
 - (6) Underground Injection Control Permit Application (EPA Form 7520-6);
 - (7) Application to Transfer Permit (EPA Form 7520-7);
 - (8) Injection Well Monitoring Report (EPA Form 7520-8);
 - (9) Completion Form for Injection Wells (EPA Form 7520-9);
 - (10) Completion Report for Brine Disposal, Hydrocarbon Storage, or Enhanced Recovery (EPA Form 7520-10);
 - (11) Annual Disposal/Injection Well Monitoring Reports (EPA Form 7520-11);
 - (12) Well Rework Record (EPA Form 7520-12);
 - (13) Plugging and Abandonment Plan (EPA Form 7520-14);
 - (14) All EPA field inspection notes, reports, videos, and pictures;
 - (15) Penalty Orders, Administrative Compliance Orders, Imminent and Substantial Endangerment Orders, or any other administrative orders issued pursuant to the Safe Drinking Water Act (SDWA);
 - (16) Incident reports of spills or purges that have impacted or potentially impacted any waterways or water bodies in or adjacent to the AOI;
 - (17) Voluntary disclosures made by Chaparral Energy, LLC, or any of its affiliates to the EPA;



- (18) Monthly Well Identification/Status Report (WISR) spreadsheets and attached plat maps of the AOI;
- (19) Mechanical integrity test requests, reports and results;
- (20) Zone of endangering influence as defined by 40 C.F.R. § 147.2904 (Area of Review);
- (21) Notices to Osage UIC office of any mechanical failures or down-hole problems involving well integrity, well workovers, or any noncompliance pursuant to 40 C.F.R. § 147.2913;
- (22) Workover permits from BIA Osage Agency 40 C.F.R. § 147.2913;
- (23) All monitoring records dating back three years 40 C.F.R. § 147.2913;
- (24) Corrective action taken on improperly sealed, completed or abandoned wells or wellbores within the zone of endangering influence as defined in 40 C.F.R. § 147.2904 (Area of Review);
- (25) Notices of corrected action required pursuant to 40 C.F.R. §§ 147.2914 or 147.2923;
- (26) Permit Reviews by Regional Administrator pursuant to § 147.2917;
- (27) BIA's Application for Operation or Report on Wells;
- (28) Notices of corrective action required pursuant to 40 C.F.R. § 147.2904;
- (29) Permit modification or termination, notice of planned changes or anticipated noncompliance;
- (30) Documents submitted by Chaparral Energy, LLC, or its affiliates regarding any planned changes to a facility, advance notices of noncompliance or transfer notices;
- (31) Any information requests by the EPA regional administrator to Chaparral Energy, LLC, or its affiliates;
- (32) All gas and fluid samples and monitoring records within the AOI;
- (33) Records of monthly volumes of oil and water production by well within the AOI;



- (34) Records of monthly water and CO₂ injection volumes and injection pressures by well within the AOI;
- (35) Tabulation of the wells within the Area of Review;
- (36) Any videos or photographs of any spills, purging wells or geysers or other permit violations or issues;
- (37) Reports or data by well showing periods of time when no CO₂ was injected;
- (38) Water monitoring reports or data;
- (39) Construction compliance reports or data;
- (40) Workover reports or data; drilling permits granted within the AOI, any reports from the drilling and workover companies;
- (41) If not already provided pursuant to a previous request, any records or reports of any wells that have been re-plugged due to evidence of upward migration;
- (42) If not already provided pursuant to a previous request, Chaparral Energy, LLC's, or its affiliates' applications to the EPA to permit and construct or operate an oil and gas related injection well on Oklahoma Indian Lands; and
- (43) Any other notices sent by the EPA to Chaparral Energy, LLC, or its affiliates, not already provided pursuant to a previous request.